

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN BROADCASTING
COMPANIES, INC., DISNEY
ENTERPRISES, INC., TWENTIETH
CENTURY FOX FILM CORPORATION,
CBS BROADCASTING INC., CBS STUDIOS
INC., FOX TELEVISION STATIONS, LLC,
FOX BROADCASTING COMPANY, LLC,
NBCUNIVERSAL MEDIA, LLC,
UNIVERSAL TELEVISION LLC, and OPEN
4 BUSINESS PRODUCTIONS, LLC,

Plaintiffs,

v.

DAVID R. GOODFRIEND and SPORTS
FANS COALITION NY, INC.,

Defendants.

No. 19-cv-7136 (LLS)

**THIRD JOINT STIPULATION AND [PROPOSED] ORDER
MODIFYING CASE SCHEDULING ORDER**

Plaintiffs, American Broadcasting Companies, Inc., Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, CBS Broadcasting Inc., CBS Studios Inc., Fox Television Stations, LLC, Fox Broadcasting Company, LLC, NBCUniversal Media, LLC, Universal Television LLC, and Open 4 Business Productions, LLC (“Plaintiffs”), and Defendants, David R. Goodfriend and Sports Fans Coalition NY, Inc. (“Defendants”), by and through their counsel, respectfully submit this Third Joint Stipulation and Proposed Order Modifying the Scheduling Order in the above-captioned matter.

On January 31, 2020, this Court entered an initial Scheduling Order with deadlines set through the close of expert discovery on September 11, 2020. At the parties’ joint request, this Court on May 12, 2020 entered an Order modifying the case schedule by extending the existing

deadlines by eight weeks, and on July 6, 2020 entered an Order modifying the case schedule by extending the existing deadline by an additional eight weeks (and nine weeks in one instance in light of the Christmas/New Year holiday).

The parties now request a third eight-week extension of the deadlines set forth below to give the parties sufficient time to complete ongoing party and third-party fact discovery on which they have been diligently working. Counsel for the parties have conferred about the effect of these circumstances upon the case's schedule. This is the third time the parties have sought an extension or modification to the case schedule.

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that the following deadlines are extended pursuant to the table below:

Event	Current Deadline	New Deadline
Status conference	Friday, October 9, 2020	Friday, December 4, 2020
Fact discovery completed	Friday, October 9, 2020	Friday, December 4, 2020
Burden-of-proof expert reports	Friday, November 6, 2020	Friday, January 8, 2021
Rebuttal expert reports	Friday, December 4, 2020	Friday, February 5, 2021
Expert discovery completed	Friday, January 8, 2021	Friday, March 5, 2021

